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June 16, 2022

Hon. Ann M. Donnelly
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722
via ECF

Re: All Systems Maintenance, Inc., et al. v. Giordano, et al.
Docket No. 21-cv-06412

Your Honor:

As the Court is aware, I represent the Plaintiffs in the above referenced matter. Plaintiffs intend to file state law claims in State Court in connection with the conduct alleged in the complaint before this Court. Accordingly, Plaintiffs respectfully request that the above referenced complaint be dismissed pursuant to FRCP 41(a)(2), without prejudice and without costs or fees, so that plaintiffs may file in State Court.

Thank you for your consideration.

Respectfully submitted,

Russo Karl Widmaier & Cordano, PLLC

/s/ Joseph Indusi, Esq.